

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**OBJECTION OF MIDFIRST BANK TO THE MOTION
TO MODIFY AMENDED PLAN (DOCKET NUMBER 80)**

MidFirst Bank ("Creditor") by and through its undersigned counsel, objects to the confirmation of the currently proposed modified plan filed at Docket Number 80 attached to Debtor's Motion to Modify Amended Plan ("Plan") by Sean N. Sinclair and Claire S. Sinclair (collectively, "Debtor") as follows:

1. Creditor holds a security interest secured by a mortgage lien on Debtor's property commonly known as 3307 Sheldon Avenue, Bristol, PA 19007 ("Property").
2. Creditor filed a Proof of Claim in the amount of \$194,321.62. This amount includes a pre-petition arrearage in the amount of \$25,479.03.
3. The Creditor objects to the Motion to Modify as it fails to include the Post Petition Fees of \$510.00 from the Post-Petition Fee Notice filed January 17, 2023.

WHEREFORE, Creditor respectfully requests that the Court deny the confirmation of the

Debtor's currently proposed Motion to Modify Amended Plan.

Respectfully submitted,

/s/Alyk L. Oflazian

Alyk L. Oflazian, Esquire (312912)

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Attorneys for Creditor

The case attorney for this file is Alyk L. Oflazian.

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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	
	:	Case No.: 18-14703
Sean N. Sinclair,	:	Chapter 13
Claire S. Sinclair,	:	Judge Eric L. Frank
	:	*****
	Debtors.	
	:	
Sean N. Sinclair,	:	
Claire S. Sinclair,	:	Related Document No. 80
	:	
	Movant,	:
v.	:	
	:	
MidFirst Bank,	:	
Kenneth E. West,	:	
	Respondents.	

CERTIFICATE OF SERVICE

I certify that on the date of filing, a copy of the foregoing Objection of MidFirst Bank to the Motion to Modify Amended Plan was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

Kenneth E. West, Chapter 13 Trustee, ecfemails@ph13trustee.com

Paul H. Young, Attorney for Sean N. Sinclair and Claire S. Sinclair, support@ymalaw.com

I certify that on the date of filing, a copy of the foregoing document was sent by U.S. Mail to the following:

Sean N. Sinclair and Claire S. Sinclair, 3307 Sheldon Avenue, Bristol, PA 19007

/s/Alyk L. Oflazian